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Attorneys for Plaintiff
Fresh Pacific Fruit and Vegetable, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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FRESH PACIFIC FRUIT AND :
VEGETABLE, INC., : Docket No. 13 cv ____ ()

Plaintiff, :

- *Against* - :

HANJIN SHIPPING CO. LTD., : **COMPLAINT**

Defendant. :

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The Plaintiff, Fresh Pacific Fruit and Vegetable, Inc., by and through its attorneys Hill Rivkins LLP, as and for its complaint against the above-named defendant, alleges upon information and belief as follows:

PARTIES

1. At and during all times hereinafter mentioned, plaintiff, Fresh Pacific Fruit and Vegetable, Inc., was and now is a corporation organized and existing by virtue of California law with an office and principal place of business at 7650 N. Palm Avenue, Suite 103, Fresno, California.

2. At and during all times hereinafter mentioned, defendant Hanjin Shipping Co. Ltd., ("Hanjin") was and now is a corporation organized and existing by virtue of foreign law

with an office and principal place of business at 25, Gukjegeumyung-ro 2-gil, Yeongdeungpo-gu Seoul, Republic of Korea and a local office at 80 East Route 4, Suite 200, Paramus, New Jersey and was and now is an ocean common carrier of goods for hire operating in, about and through this district.

JURISDICTION

3. This Honorable Court has subject matter jurisdiction pursuant to 28 U.S.C. §1333 and this is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure.

THE CLAIM

4. In or about August 2013, there was delivered to Defendant in good order and condition a shipment of 700 cartons of California Almonds suitable in every respect for the subject transportation which Defendant received, accepted and agreed to transport from California to Shandong, China pursuant to bill of lading HJSCPHX346909400.

5. Defendant failed to re-deliver the subject shipment in the same good order and condition as when it was received.

6. By reasons of the premises, Defendant breached and violated its duties and obligations and as a common carrier and bailee of the cargo, was negligent and careless in its handling of the subject shipment and was otherwise at fault.

7. Plaintiff was the shipper, owner, consignee and/or insurer of the subject shipment and brings this action on its own behalf and on behalf of all parties who are or may become interested in the subject shipment, as their respective interests may ultimately appear, and Plaintiff is entitled to maintain this action.

8. Plaintiff has performed all duties and obligations on its part to be performed.

9. By reason of the premises, Plaintiff has sustained damages as nearly as same can now be estimated, no part of which has been paid, although duly demanded, in the total amount of \$12,723.00 plus interest, costs and attorneys' fees.

WHEREFORE, Plaintiff prays:

1. That process in due form of law according to the practice of this Court may issue against the Defendant.

2. That if the Defendant cannot be found within this District, that all of their property within this District be attached in the sum set forth in this Complaint, with interest and costs.

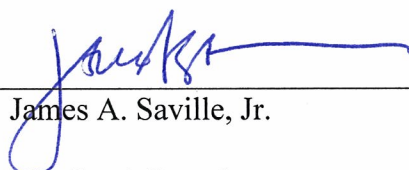
3. That a decree may be entered in favor of Plaintiff against Defendant the amount of Plaintiff's damages, together with pre-judgment interest, costs and attorneys' fees.

4. Plaintiff further prays for such other, further and different relief as to this Court may deem just and proper in the premises.

Dated: South Amboy, New Jersey
August 12, 2014

HILL RIVKINS LLP
Attorneys for Plaintiff
Fresh Pacific Fruit and Vegetable, Inc.

By: _____


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